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July 17<sup>th</sup>, 2003

e-mail

Stacey Hogan  
Assistant Editor  
Contact Center World

RECEIVED

AUG 14 2003

Federal Communications Commission  
Office of the Secretary

Re NEW DISCOVERY

Dear Stacey

Beautyrock is a telemarketer And so am I So are 750 individuals working in our outbound call centers in Cornwall, Brockville, Belleville and Kingston, Ontario, Canada

In almost 30 years of Telemarketing experiences and another fifteen in Direct Mail we have accumulated a lot of information, facts about consumers, responses to offers and media.

Included in that data (real numbers) is the fact that Beautyrock gets an average 18% positive response to telemarketing offers of our continuity products for our clients in the U.S and Canada

We make almost one million calls per month, have been in business nineteen years, satisfy several clients, don't cheat or misrepresent and we discovered a way to use our predictive dialler very economically without abandoning anyone Yes, Zero % abandons . no dead air no hangups no harassing anyone no scaring seniors by abandoning!!

OUR DISCOVERY, WE SHARE WITH YOU FREE !!

But first, know that on top of the 18% who say yes to our offers, almost all the balance of 82% listen to our offers Less that 4% ask to be removed from our clients list and we along with our clients respect and fulfill these requests!

Also know that we are not crooks or harassers nor do we over-sell or call at ungodly hours, or abuse consumers in any other way

Statistically, it would be interesting if the FTC, FCC, DMA, CMA, ATA, and Chambers of Commerce could provide from their records the numbers of complaints about Beautyrock or our clients since we are one of the many targets of unnecessary legislation!

OUR DISCOVERY

No. of copies rec'd 2  
Ltr. ABOVE

INSTEAD OF ABANDONING, our predictive dialler plays a recording that says "This is XYZ company I'm on another line I'll be with you in a few seconds Please hold."

This discovery comes about partly because of California's early legislation proposals which recommended NO ABANDONS

We abandon no one We never leave dead air. We don't hang up on anyone. We don't arouse fear in seniors wondering who called! We don't need ABANDON legislation because we don't abandon any one It works a lot like inbound simply asking the prospect to hold for a live representative

Our customers welcome us, thank us for immediate identification, and wait an average of 11 seconds for our live sales representative Less than 3% of live answers hang up on us (abandon us) We call these people again later and the number who comment on the earlier call is negligible

The TWO SECOND FTC, FCC RULE, insisting on speaking live to a live answered call within two seconds (otherwise we have to count it as an abandon to meet the 3% acceptable abandon rule) is unreasonable, arbitrary and seems to have another agenda which only its creators would know about!

Our production rates, talk time, predictive dialler benefits, response rates are as good as or better than when we were abandoning 5% under the old rules And we abandon no one. Zero % abandons We fulfil the spirit of the FTC, FCC legislation by bringing no inconvenience due to abandoning to our customers

The system works just as good cold calling as it does calling pre-established relationship prospects

We have been using this system almost one year at a rate of over 500,000 completed calls per month (A completed call at Beautyrock is a sale or refusal)

So what's my beef?

We are not in the business of violating laws, even unjust laws We want to use our discovery, indeed we share it with all telemarketers for their testing expecting no compensation

If legislation is absolutely required then it could say that following our "Hold for a few seconds" message, that we must answer live within 30 seconds, (not two seconds) or else .. ..

Abandoning anyone, even 3% is rude, ignorant, distasteful, even arrogant

Our discovery abandons no one. It has stood the test of time and customer response over millions of calls. It is 100% acceptable to the public and it does not get in the way of innovation, creativity, new ideas or processes.

We are simply "asking for a ruling" that what we do does not result in an abandon, therefore it has nothing to do with the 3% abandon rules. We need this ruling because of the fears of our clients of \$11,000 per violation fines.

Beautyrock is a member of DMA, ATA and CMA. Attention to our request is required. I hope your clients and/or associates can use our discovery.

Sincerely,

Stan Body  
President

P.S. You and legislators, other telemarketers and predictive dialling companies are welcome in any of our call centers any time to examine our system, to see how it works and to confirm my claims. We have invited FCC, FTC, DMA, ATA, CMA and CRTC in the past and they have chosen to ignore our invitations.